

REMARKS/ARGUMENTS

1. Rejection of claims 1 and 4 under 35 U.S.C. 103(a):

Claims 1 and 4 are rejected under 35 U.S.C. 103(a) as being unpatentable over
Hatakenaka et al. (US 6,075,949, Hatakenaka hereinafter) in view of admitted prior
5 art and further in view of Sabbagh et al. (US 6,814,510, Sabbagh hereinafter).

Response:

Claim 1 has been amended to clarify the claimed invention. Claim 1 now the
computer system device limitation into the form of a method step. In addition, the
10 claim now emphasizes that the printer manager used for generating print data
belongs to the computer system. The claimed method steps are performed in the
operating system and the printer manager of the computer system.

On the other hand, Hatakenaka teaches an electronic camera 1 containing a
15 signal processing unit 3, an encoding/decoding unit 4, a control unit 11, and a printer
interface 8 that is connected to an external printer 31. Hatakenaka does not teach a
computer system comprising an operating system with an upper layer for controlling
a graphical device interface or a lower layer for controlling input/output activities.

20 Since Hatakenaka does not teach the use of an operating system having an
upper layer and a lower layer, none of the cited prior art references teaches
performing the claimed step of “utilizing the converter to convert the raw data into
the device-dependent print data without utilizing the upper layer”. Although
Hatakenaka teaches decoding image data, Hatakenaka fails to teach performing this
25 step without utilizing the upper layer of the operating system. Indeed, since
Hatakenaka fails to clearly teach an operating system having an upper layer and a
lower layer, one skilled in the art would not be motivated to combine Hatakenaka’s

5 teachings from the electronic camera 1 and it with that of the admitted prior art or Sabbagh. There is no intuitive way to incorporate Hatakenaka's teachings into that of the admitted prior art or Sabbagh since Hatakenaka generates print data that would instead be generated by Sabbagh when Sabbagh bypasses the upper layer containing the GDI 316, as shown in Figure 3.

10 For these reasons, the applicant submits that the combination of Hatakenaka, the admitted prior art, and Sabbagh does not teach all of the claimed limitations contained in claim 1, and claim 1 should be patentable over the cited prior art.

Claim 4 is dependent on claim 1, and should be allowed if claim 1 is allowed. Reconsideration of claims 1 and 4 is respectfully requested.

2. Rejection of claims 2-3 and 6 under 35 U.S.C. 103(a):

15 Claims 2-3 and 6 are rejected under 35 U.S.C. 103(a) as being unpatentable over Hatakenaka in view of admitted prior art and further in view of Sabbagh and further in view of Shiohara (US 6,618,553).

Response:

20 Claims 2, 3, and 6 are dependent on claim 1, and should be allowed if claim 1 is allowed. Reconsideration of claims 2, 3, and 6 is respectfully requested.

3. Rejection of claims 7-9 under 35 U.S.C. 103(a):

25 Claims 7-9 are rejected under 35 U.S.C. 103(a) as being unpatentable over Hatakenaka in view of admitted prior art and further in view of Sabbagh and further in view of Nakajima et al. (US 2002/0135687).

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Response:

Claims 7-9 are dependent on claim 1, and should be allowed if claim 1 is allowed. Reconsideration of claims 7-9 is respectfully requested.

5 Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Sincerely yours,

10 Winston Hsu Date: 03/27/2007

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